

Document Page 1 of 3  
IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re the matter of

EUGENIA HILL,

Debtor.

NO. 19-19508

CHAPTER 13

JUDGE TIMOTHY A. BARNES

NOTICE OF MOTION

TO:

Eugenia Hill  
8155 S. Kenwood  
Chicago, IL 60619  
**BY U.S. MAIL**

David M. Siegel, Attorney for Debtor  
Marilyn O. Marshall, Chapter 13 Trustee

**BY ELECTRONIC TRANSMISSION**  
**BY ELECTRONIC TRANSMISSION**

PLEASE TAKE NOTICE that on November 7, 2019, at 9:30 a.m., or as soon thereafter as Counsel may be heard, we shall appear before the Honorable TIMOTHY A. BARNES, Bankruptcy Judge, at **219 South Dearborn Street, Courtroom #744, Chicago, Illinois**, and then and there present the attached Motion to Modify the Automatic Stay, a copy of which is hereby served upon you.

PROOF OF SERVICE

I, the undersigned attorney, certify that I served a copy of this Notice with Motion to Modify the Automatic Stay attached, upon the parties listed above, by the methods specified, from 2056 Ridge Road, Homewood, Illinois 60430 before the hour of 5:00 P.M. on the 22<sup>nd</sup> day of October, 2019.

BY: /s/ Terri M. Long  
TERRI M. LONG

LAW OFFICES OF TERRI M. LONG

2056 Ridge Road

Homewood, Illinois 60430

Phone: (708) 922-3301

Fax : (708) 922-3302

Atty. for GLOBAL LENDING SERVICES LLC, its Successors and/or Assigns

Document Page 2 of 3  
IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re the matter of

EUGENIA HILL,

Debtor.

NO. 19-19508

CHAPTER 13

JUDGE TIMOTHY A. BARNES

MOTION TO MODIFY AUTOMATIC STAY

Now comes GLOBAL LENDING SERVICES LLC, its successors and/or assigns, (hereinafter referred to as “Movant”) a creditor herein, by TERRI M. LONG, its attorney, and moves this Honorable Court for entry of an Order modifying the restraining provisions of §362 of the Bankruptcy Code, and in support thereof respectfully represents as follows:

1. On July 11, 2019, the Debtor herein filed a petition for relief under Chapter 13 of the Bankruptcy Code.

2. Movant is a creditor of the Debtor with respect to a certain indebtedness secured by a lien upon a 2017 Ford Fusion motor vehicle, with an outstanding balance of \$19,923.36.

3. The Debtor has not offered, and Movant is not receiving, adequate protection for its secured interest or depreciating value.

4. Movant will suffer irreparable injury, harm and damage should it be delayed in taking possession of the motor vehicle aforesaid and foreclosing its security interest therein.

5. According to the Debtor’s confirmed plan, the Debtor is the disbursing agent for all payments to creditor.

6. The Debtor has caused a default in contract payments in the amount of \$2,641.32 through October 17, 2019, including attorney fees and court costs.

7. Movant requests that Bankruptcy Rule 4001(a)(3) not apply to any Order granting this motion.

WHEREFORE, GLOBAL LENDING SERVICES LLC, its successors and/or assigns, prays that this Honorable Court enter an Order modifying the restraining provisions of §362 of the Bankruptcy Code to permit the said GLOBAL LENDING SERVICES LLC, its successors and/or assigns, to take possession of and foreclose its security interest in a certain 2017 Ford Fusion motor vehicle, V.I.N. 3FA6P0H76HR290656, and for such other and further relief as this Court may deem just.

GLOBAL LENDING SERVICES LLC, its  
Successors and/or Assigns

BY: /s/ Terri M. Long  
TERRI M. LONG

LAW OFFICES OF TERRI M. LONG  
2056 Ridge Road  
Homewood, Illinois 60430  
Phone: (708) 922-3301  
Fax : (708) 922-3302  
Atty. for GLOBAL LENDING SERVICES LLC, its Successors and/or Assigns